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Attorneys for Plaintiffs

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON**

In re:

**Country Coach, LLC**, a Delaware limited  
liability company,

Debtor.

Case No. **09-60419-aer11**

INVOLUNTARY CHAPTER 11

**MOTION FOR ORDER FOR RULE  
2004 EXAMINATION OF JAY  
HOWARD**

Pursuant to Federal Rules of Bankruptcy Procedure 2004, Wells Fargo Bank, National Association (“**Wells Fargo**”), acting through its Wells Fargo Business Credit operating division, a secured creditor herein, moves this Court for an Order requiring **JAY HOWARD** to appear at **10:30 a.m. on March 12, 2009**, at the conference room of Muhlheim Boyd, LLP, 88 East Broadway, Eugene, OR 97401, and to testify regarding:

**MOTION FOR ORDER FOR RULE 2004 EXAMINATION OF  
JAY HOWARD - Page 1 of 4**

1. The property of the alleged debtor, including, but not limited to:
  - a. The finished coach inventory;
  - b. Work in progress inventory including, but not limited to the number of coaches in process, but not yet completed;
  - c. Raw materials inventory;
  - d. Furniture, fixtures and equipment;
  - e. Any claims that the prospective bankruptcy estate might assert to recover transfers to creditors and insiders of the alleged debtor; and
  - f. For the period of 48 months preceding the filing of the involuntary petition, the existence and contents of any appraisals of the alleged debtor's assets.
2. The post-petition expenses of the alleged debtor including, but not limited to, all occupancy costs, utility costs, insurance costs and payroll. If any such expenses have been paid post-petition, the identity and amount of each such payment and the source of funds to make such payments. If the expenses have not been paid, the amount accrued for such expenses and the identity of and accrued amount owed to each creditor.
3. The existing or prospective source of funds to pay administrative expenses of the alleged debtor before confirmation of a plan of reorganization.
4. The existing or prospective source of funds for use by a reorganized debtor.
5. Transfers, exclusive of wages and salaries reported on Form W-2, to insiders of the alleged debtor within the 24 months preceding the date the prospective petition was filed in this case.
6. The identities of:

- a. each officer of the alleged debtor;
- b. any member who owns any interest in the alleged debtor;
- c. if any member described in subpart 6.b. is an entity, the identity of any individual empowered to act on behalf of such member; and
- d. any other person or entity legally entitled to participate in management of the alleged debtor or to act on behalf of the alleged debtor.

Movant further requests an order of this court directing the above named party to produce to Movant, before the close of business on the third day preceding the date for the examination, any record or document related to the subject matter of the examination. Production shall be made at the offices of Muhlheim Boyd, LLP, 88 East Broadway, Eugene OR 97401.

**COMPLIANCE WITH LBR 2004-1.B**

To the best of Movant's knowledge, neither the alleged debtor nor the person who is the subject of this motion is represented by counsel. As a result, Movant has not conferred with adverse counsel. Movant will cooperate, to the extent practical, with rescheduling the examinations after service.

This motion is supported by the Declaration of Wilson C. Muhlheim filed herewith.

DATED this 20<sup>th</sup> day of February, 2009.

/s/ Wilson C. Muhlheim  
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Attorneys for Wells Fargo

CERTIFICATE OF SERVICE

I hereby certify that on the 20<sup>th</sup> day of February, 2009, I directed my staff to serve the foregoing MOTION FOR ORDER FOR RULE 2004 EXAMINATION OF JAY HOWARD, by depositing in the United States mail at Eugene, Oregon full and complete copies thereof, by first class mail, postage prepaid, hand delivered, or by email where indicated, addressed to the following:

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I hereby certify that on the 20<sup>th</sup> day of February, 2009, my staff determined from the United States Bankruptcy Court electronic case filing system that the following parties will be served electronically via ECF:

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By: /s/ Wilson C. Muhlheim  
Wilson C. Muhlheim, OSB #681114  
Of Attorneys for Wells Fargo, N.A.